

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

**BOBBY BLAND, DANIEL RAY CARTER,
JR., DAVID W. DIXON, ROBERT W.
MCCOY, JOHN C. SANDHOFER, and
DEBRA H. WOODWARD**

Plaintiffs,

CASE NO. 4:11-CV-45

v.

**B.J. ROBERTS, individually and in his official
capacity as Sheriff of the City of Hampton,
Virginia**

Defendant.

DECLARATION

I, Debra Woodward, having direct knowledge of the information set forth herein, hereby depose and declare as follows:

1. I am a citizen and resident of the Commonwealth of Virginia and the United States. I maintain my principal residence at 131 Eggleston Avenue, Hampton, Virginia 23669. I was employed by the Hampton Sheriff's Office from August of 1998 to December of 2009 in an administrative, non-uniformed, non-sworn position.
2. The Sheriff did not offer to make me a uniformed deputy prior to my termination.
3. In my position within the administration division, my job was to maintain training records, schedule training and serve as training coordinator. I also provided general administrative support from time to time to various senior officers. While I was responsible for the quality and accuracy of my work, I was not responsible for training within the Hampton Sheriff's Office as that responsibility fell to my immediate supervisor. I was essentially a clerk.

Exhibit 11

I did not have access to and was not responsible for any confidential information. In my old position in human resources, I did have access to background checks and other types of confidential information, but that was more than five years before my termination. I was not a policy maker and was never consulted about any type of Hampton Sheriff's Office policy.

4. I supported Jim Adams' campaign for Sheriff in 2009. I informed several co-workers of my support for Adams when asked, including all of the Plaintiffs in this action, Sgt. John Meyers, Sandra Sanders, Doris Battle and others. It is true that I generally tried to keep this quiet because of the position I was in. In early 2009, Deborah Davis, my previous supervisor and mentor, became the treasurer of Jim Adams' campaign for Sheriff of the City of Hampton. She had recently left her position as the Director of Administration in the Hampton Sheriff's Office.

5. Throughout my employment in the Hampton Sheriff's Office I worked in the executive suite providing administrative support to senior leaders. I interacted with senior leadership frequently. Though Bobby Bland and I were purely rank and file, administrative support employees, we had unique access to and interaction with Sheriff Roberts and his senior leaders. For example, Bobby and I would attend birthday celebrations of senior leadership, including the Sheriff. In fact, I made the Sheriff's birthday cake every year. I traveled to Florida with Sheriff Roberts and Colonel Bowden in 2006 to provide support to them while they attended the National Sheriff's Association conference.

6. Prior to 2009, I was extremely active in Sheriff Roberts' campaign fundraising and re-election efforts. I was one of the most tireless volunteers providing support services to his political efforts. These efforts included handing out flyers, working the polls, placing yard signs, attending campaign events, selling tickets, buying tickets, etc. I did none of these things in 2009

and it had to be noticed. It was very well known within the office that I was close to Jim Adams. While I had supported Sheriff Roberts in the past, the fact of the matter was that I enthusiastically supported Jim Adams' candidacy in 2009.

7. In the summer of 2009, just as the campaign season was getting under way, I noticed that one of my colleagues, Lt. George Perkins, was circulating petitions for Sheriff Roberts. Lt. Perkins was not a resident of Hampton. It was always my clear understanding that only residents of Hampton could circulate these petitions. This upset me a great deal and I protested to Sgt. Sharon Mays, Sgt. Meyers, Lt. Perkins and others.

8. In talking to Sgt. Mays I learned that another non-resident of Hampton was circulating petitions. I had various conversations in the executive suite about this matter. Most of the conversations were with Sgt. Mays. Sgt. Mays regularly has lunch with Major Wells-Major, Dep. Harper (Col. Bowden's sister) and Col. Bowden. Their offices were in the same area in which these discussions were held.

9. My motivation for protesting these irregularities was simply that the practice was unlawful and being done openly in the office. It was unlawful on two levels: 1) this type of thing was not to be done at work, on the clock and 2) you had to be a resident of Hampton to do it.

10. I believe my colleagues viewed my protests as opposition to the Sheriff or support for Adams.

11. I attended a meeting of administrative employees in the late summer of 2009 which was attended by Sheriff Roberts. Sheriff Roberts spoke to our group of employees about the upcoming election. It was clear to me that Sheriff Roberts was upset about Danny Carter's presence on Facebook supporting Jim Adams. Sheriff Roberts said that he would "have his job as long as he wanted it. He related that this was a "bad economy and that people were knocking down his door for these jobs." He said that his was the "long train" and that we should not get on the "short train" with the man that he fed for 16 years. In sum, it was clear to me that his message was that if we openly supported Adams our jobs were in jeopardy.

12. Throughout my employment with the Hampton Sheriff's Office I received excellent performance evaluations. The last evaluation I received before my termination was outstanding, the highest performance evaluation in the Sheriff's rating system. All of my evaluations in the past were either "above average" or "outstanding".

13. I was terminated from my position very shortly after the 2009 election.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 23, 2011

Debra Woodward
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